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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 NATHANAEL JONES, and
D-2 CHRISTOPHER SHON TURNER,

Defendants.

Case:4:21-cr-20182
Judge: Leitman, Matthew F.
MJ: Ivy, Curtis
Filed: 03-17-2021 At 01:07 PM
SEALED MATTER (tt)

INDICTMENT

THE GRAND JURY CHARGES:

FILED
MAR 17 2021
U.S. DISTRICT COURT
FLINT, MICHIGAN

COUNT ONE

(21 U.S.C. §§ 846 and 841(a)(1))

**Conspiracy to Possess with Intent to Distribute and to
Distribute Cocaine**

**D-1 NATHANAEL JONES,
D-2 CHRISTOPHER SHON TURNER**

From a date unknown to the Grand Jury, but since at least the fall of 2020, to on or about December 18, 2020, in the Eastern District of Michigan, NATHANAEL JONES and CHRISTOPHER TURNER knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with

intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendants of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the

violations alleged, or property traceable thereto; all property involved in, or property traceable to, the violations alleged in this Indictment.

Dated: March 17, 2021

THIS IS A TRUE BILL

SAIMA MOHSIN
Acting United States Attorney

ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/Timothy Turkelson
TIMOTHY TURKELSON
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(P53748)

Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet**Case: 4:21-cr-20182
Judge: Leitman, Matthew F.
MJ: Ivy, Curtis
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. NATHANAEL JONES & CHRISTOPHER TURNER**County where offense occurred :** GENESEE**Check One:** ☒ **Felony** ☐ **Misdemeanor**U.S. DISTRICT COURT
FLINT, MICHIGAN

☒ Indictment/ ☐ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**March 17, 2021

Date

s/TIMOTHY TURKELSON

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P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.